

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

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2017 FEB 28 A 11 31

COREY ELLINGTON)

530 NORWOOD STREET)

EAST ORANGE, NJ 07018)

Plaintiff.)

v.)

OCWEN LOAN SERVICING, LLC)

1661 WORTHINGTON ROAD SUITE 100)

WEST PALM BEACH, FL 33409)

Defendant.)

Case no. _____

Jury Trial Demanded

COMPLAINT

Plaintiff Corey Ellington (“Plaintiff”) brings this complaint against Ocwen Loan Servicing, LLC (“Defendant”), a loan servicer, for placing unauthorized telephone calls to his mobile phone using a prerecorded or artificial voice. Plaintiff alleges as follows upon personal knowledge as to himself and his own acts and experiences upon information and belief.

NATURE OF ACTION

1. In an effort to advance its loan servicing business, Ocwen Loan Servicing, LLC, a loan servicer, violated federal law by making unauthorized telephone calls using a prerecorded or artificial voice (“robocalls”) to the mobile telephone of Plaintiff.
2. By effectuating these unauthorized robocalls, Defendant has violated the called

Party's ("Plaintiff") statutory rights and has caused the call recipient ("Plaintiff") actual harm, as the Plaintiff was subjected to the persistent aggravation and invasion of privacy that accompanies unsolicited automated calls at Plaintiff's inconvenience as many calls were disruptive to Plaintiff's work and business agenda.

3. In order to redress these injuries, Plaintiff, brings suit under the Telephone Consumer Protection Act, 47 U.S.C. § 227 (the "TCPA"), which protects the privacy right of consumers to be free from receiving unsolicited telephone calls using a prerecorded or artificial voice.
4. Plaintiff seeks an award of statutory damages as well as any reimbursement of any losses and all fees associated with the filing of this complaint as allowable by this court.

JURISDICTION

5. This Court has federal question subject matter jurisdiction under 28 U.S.C. § 1331, as the action arises under the federal Telephone Consumer Protection Act, 47 U.S.C. § 227.

VENUE

6. Venue is proper before this Court pursuant to 28 U.S.C. § 1391(b) because Defendant conducts business in this District; and because a substantial part of the events concerning the conduct at issue occurred in this District, as certain of the unauthorized prerecorded and/or artificial voice calls originated from phone numbers utilized by Defendant in this District.

PARTIES

7. Plaintiff, Corey Ellington ("Plaintiff") is domiciled in the State of New Jersey, County of Essex, and City of East Orange.

8. Defendant Ocwen Loan Servicing, LLC, whose principal place of business is in the State of Florida, County of Palm Beach, and City of West Palm Beach, is an entity who at all relevant times was engaged, by use of “automatic telephone dialing system” as defined by 47 U.S.C. § 227a(1), in the business of attempting to collect a “debt”.

FACTUAL ALLEGATIONS

9. Defendant Ocwen Loan Servicing, LLC is an entity that collects mortgage payments, and who at all relevant times was engaged in the business of attempting to collect a debt.
10. As an ordinary business practice, Defendant collects the telephone numbers of its customers upon the purchase, reassignment and/or servicing of mortgage accounts and then uses those numbers going forward as part of its automated calling operation for collection purposes. Defendant places such automated calls using an automated telephone dialing system featuring a prerecorded or artificial voice primarily in an effort to collect on current and delinquent accounts.
11. In an effort to reduce costs associated with maintaining its automated calling operation, Defendant spurns any procedures necessary to confirm that the telephone numbers to which Defendant places robocalls actually belong to the customers that were previously delinquent.
12. As a consequence, many of the telephone numbers Defendant receives in connection with its debt collection operation are inaccurate, or have become inaccurate, and result in Defendant routinely placing prerecorded or artificial voice telephone calls to individuals who never provided consent to be called by Defendant.
13. On May 7, 2014, Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded

voice in an apparent effort to collect debts from another intended recipient.. (See Call Log/Screenshot, attached as **Exhibit 1**)

14. On May 13, 2014, Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 1**)
15. On May 27, 2014 at 4:00pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 2**)
16. On May 28, 2014 at 5:00pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 3**)
17. On May 29, 2014 at 8:06pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 4**)
18. On May 30, 2014 at 4:58pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 5**)

19. On May 31, 2014 at 8:43am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.
(See Call Log/Screenshot, attached as **Exhibit 6**)
20. On May 31, 2014 at 4:18pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.
(See Call Log/Screenshot, attached as **Exhibit 7**)
21. On June 1, 2014 at 1:36pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.
(See Call Log/Screenshot, attached as **Exhibit 8**)
22. On June 2, 2014 at 5:01pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.
(See Call Log/Screenshot, attached as **Exhibit 9**)
23. On June 3, 2014 at 3:36pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.
(See Call Log/Screenshot, attached as **Exhibit 10**)
24. On June 4, 2014 at 5:41pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or

prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 11**)

25. On June 5, 2014 at 5:17pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 12**)

26. On June 6, 2014 at 2:42pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 13**)

27. On June 8, 2014 at 1:11pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 14**)

28. On June 8, 2014 at 9:43am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 14**)

29. On June 9, 2014 Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call

Log/Screenshot, attached as **Exhibit 15**)

30. On June 10, 2014 @ 4:06pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 16**)
31. On June 12, 2014 at 5:42pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 17**)
32. On June 13, 2014 at 3:34pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 18**)
33. On June 14, 2014 at 3:31pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 19**)
34. On June 15, 2014 at 3:55pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 20**)
35. On June 15, 2014 at 9:22am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or

prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 21**)

36. On June 16, 2014 at 4:42pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 22**)

37. On June 17, 2014 at 7:12pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 23**)

38. On June 18, 2014 at 4:11pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 24**)

39. On June 19, 2014 at 4:37pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 25**)

40. On June 20, 2014 at 3:08pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 26**)

41. On June 21, 2014 at 3:06pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 27**)
42. On June 22, 2014 at 4:47pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 28**)
43. On June 22, 2014 at 11:05am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 29**)
44. On June 23, 2014 at 4:12pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 30**)
45. On June 23, 2014 at 11:22am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 31**)
46. On June 24, 2014 at 8:49am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or

prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 32**)

47. On June 25, 2014 at 7:30pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 33**)

48. On June 25, 2014 at 1:45pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 34**)

49. On June 26, 2014 at 3:35pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 35**)

50. On June 26, 2014 at 7:13pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 36**)

51. On June 27, 2014 at 3:47pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Call Log/Screenshot, attached as **Exhibit 37**)

52. On June 27, 2014 at 5:14pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Call Log/Screenshot, attached as **Exhibit 38**)
53. On November 20, 2013 at 5:33pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 39**)
54. On November 21, 2013 at 5:18pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 39**)
55. On November 23, 2013 at 8:15am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 39**)
56. On November 27, 2013 at 9:18am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 39**)
57. On November 29, 2013 at 8:30am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial

or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 39**)

58. On December 3, 2013 at 4:19pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 39**)

59. On December 6, 2013 at 4:37pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 39**)

60. On December 8, 2013 at 5:17pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 39**)

61. On December 9, 2013 at 3:28pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 39**)

62. On December 12, 2013 at 6:28pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 39**)

63. On December 24, 2013 at 5:01pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 40**)
64. On December 26, 2013 at 6:04pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 40**)
65. On January 4, 2014 at 9:15am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 40**)
66. On January 7, 2014 at 4:32pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 40**)
67. On January 16, 2014 at 4:13pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 40**)
68. On January 21, 2014 at 9:40am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial

or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 41**)

69. On January 26, 2014 at 5:23pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 41**)

70. On March 24, 2014 at 4:55pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 42**)

71. On April 3, 2014 at 4:46pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 42**)

72. On April 4, 2014 at 1:24pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 42**)

73. On April 7, 2014 at 6:47pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 42**)

74. On April 7, 2014 at 6:47pm (2nd Phone Call a few seconds after previous one) Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 42**)

75. On April 10, 2014 at 4:13pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 42**)

76. On April 11, 2014 at 4:41pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 42**)

77. On April 17, 2014 at 3:34pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 42**)

78. On April 18, 2014 at 1:19pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 42**)

79. On April 20, 2014 at 3:47pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or

prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

80. On April 21, 2014 at 4:09pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

81. On April 22, 2014 at 4:19pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

82. On April 23, 2014 at 4:18pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

83. On April 24, 2014 at 6:56pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

84. On April 24, 2014 at 3:29pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

85. On April 25, 2014 at 5:14pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

86. On April 28, 2014 at 5:42pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

87. On April 30, 2014 at 11:32am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

88. On May 8, 2014 at 5:53pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

89. On May 8, 2014 12:00pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

90. On May 9, 2014 at 5:32pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or

prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

91. On May 11, 2014 at 4:11pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

92. On May 14, 2014 at 3:27pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 43**)

93. On May 22, 2014 at 4:44pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 44**)

94. On May 23, 2014 at 7:11pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 44**)

95. On May 23, 2014 at 4:10pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient.

(See Mobile Bill Statement Call Log, attached as **Exhibit 44**)

96. On May 24, 2014 at 4:55pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 44**)
97. On May 25, 2014 at 4:51pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 44**)
98. On May 26, 2014 at 6:54pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 44**)
99. On June 8, 2014 at 3:17pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 44**)
100. On June 14, 2014 at 8:23am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 44**)
101. On August 11, 2014 at 1:19pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial

or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 45**)

102. On August 11, 2014 at 1:14pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 45**)

103. On August 11, 2014 at 1:19pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 45**)

104. On August 12, 2014 at 5:46pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 45**)

105. On August 19, 2014 at 1:26pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 45**)

106. On August 25, 2014 at 4:21pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 46**)

107. On September 3, 2014 at 10:46am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 46**)
108. On September 5, 2014 at 2:45pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 46**)
109. On September 15, 2014 at 11:31am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 46**)
110. On September 23, 2014 at 2:06pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 47**)
111. On September 26, 2014 at 3:14pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 47**)
112. On September 26, 2014 at 3:14pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an

artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 47**)

113. On September 29, 2014 at 7:11pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 47**)

114. On September 30, 2014 at 4:58pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 47**)

115. On October 8, 2014 at 11:31am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 47**)

116. On October 9, 2014 at 7:06pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 47**)

117. On October 13, 2014 at 11:28am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 47**)

118. On October 20, 2014 at 4:58pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)
119. On October 22, 2014 at 7:09pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)
120. On October 23, 2014 at 2:37pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)
121. On October 27, 2014 at 5:47pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)
122. On October 28, 2014 at 4:32pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)
123. On October 29, 2014 at 4:27pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial

or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)

124. On October 29, 2014 at 3:11pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)

125. On October 30, 2014 at 12:34pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)

126. On October 31, 2014 at 6:51pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)

127. On October 31, 2014 at 1:55pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)

128. On November 4, 2014 at 11:53am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)

129. On November 4, 2014 at 10:25am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)

130. On November 6, 2014 at 2:08pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)

131. On November 7, 2014 at 2:22pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)

132. On November 11, 2014 at 10:49am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)

133. On November 11, 2014 at 10:48am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)

134. On November 12, 2014 at 3:21pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an

artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 48**)

135. On November 24, 2014 at 2:32pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 49**)

136. On December 1, 2014 at 10:46am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 49**)

137. On December 3, 2014 at 4:29pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 49**)

138. On December 3, 2014 at 3:49pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 49**)

139. On December 3, 2014 at 3:48pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 49**)

140. On December 5, 2014 at 10:50am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 49**)

141. On December 12, 2014 at 10:44am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 49**)

142. On December 15, 2014 at 11:25am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 49**)

143. On December 16, 2014 at 9:58am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 49**)

144. On December 19, 2014 at 2:11pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 49**)

145. On December 26, 2014 at 3:41pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an

artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 50**)

146. On January 2, 2015 at 12:35pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 50**)

147. On January 23, 2015 at 12:35pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 51**)

148. On January 26, 2015 at 12:22pm Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 51**)

149. On January 30, 2015 at 10:50am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 51**)

150. On January 30, 2015 at 10:50am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 51**)

151. On February 6, 2015 at 10:40am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 51**)

152. On February 9, 2015 at 11:59am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 51**)

153. On February 12, 2015 at 8:10am Plaintiff had his privacy invaded by Defendant by receiving a phone call on his cellular telephone from Defendant that featured an artificial or prerecorded voice in an apparent effort to collect debts from another intended recipient. (See Mobile Bill Statement Call Log, attached as **Exhibit 51**)

154. On February 1, 2017 Plaintiff sent Defendant demand letter in its first attempt to resolve the matter. (See Letter, attached as **Exhibit 52**)

155. On February 8, 2017 Defendant received demand letter (See USPS Delivery Confirmation Receipt # 7015 0640 0003 8565 2675 with USPS Online Delivery Status, attached as **Exhibit 53**)

156. On February 16, 2017 Plaintiff sent Defendant written communication and in such communication relayed an intent to sue as a good faith overture and second attempt to resolve the matter without having to burden the court. (See Letter, attached as **Exhibit 54**)

157. On February 19, 2017 Defendant received letter from Plaintiff expressing an intent to sue (See USPS Delivery Confirmation Receipt # 7015 0640 0003 8565 2538 with USPS Online Delivery Status, attached as **Exhibit 55**)
158. Plaintiff is not now, nor ever has been, a debtor or customer of Defendant.
159. Exasperated, Plaintiff repeatedly informed Defendant's customer service department that the phone number that Defendant had been calling did not belong to their intended recipient and that Defendant did not have permission to call that number again. However, Plaintiff's complaints were repeatedly ignored by Defendant, even after Plaintiff registered his cellular telephone number on the National Do Not Call Registry on May 23, 2014, and Defendant's unauthorized robocalls continued unabated. (See Do Not Call Registry Confirmation for mobile phone no. (973) 789-6002, attached as **Exhibit 56**)
160. The inconvenience, personal humiliation, embarrassment, mental anguish, emotional distress, and detriment to Plaintiff's character and personal reputation that Plaintiff suffered as a result of Defendants' harassing efforts to collect the outstanding debt alleged due constitute mental anguish more than mere worry, anxiety, vexation, inconvenience, or unpleasantness.

COUNT I

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

161. Plaintiff repeats and re-alleges each and every factual allegation above.

162. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 7, 2014.
163. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
164. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.
165. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT II

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

166. Plaintiff repeats and re-alleges each and every factual allegation above.
167. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 13, 2014.
168. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
169. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

170. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT III

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

171. Plaintiff repeats and re-alleges each and every factual allegation above.
172. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 27, 2014 at 4:00pm.
173. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
174. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.
175. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT IV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

176. Plaintiff repeats and re-alleges each and every factual allegation above.
177. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 28, 2014 at 5:00pm.
178. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
179. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.
180. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT V

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

181. Plaintiff repeats and re-alleges each and every factual allegation above.

182. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 29, 2014 at 8:06pm.

183. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

184. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

185. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT VI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

186. Plaintiff repeats and re-alleges each and every factual allegation above.

187. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 30, 2014 at 4:58pm.

188. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

189. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

190. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT VII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

191. Plaintiff repeats and re-alleges each and every factual allegation above.

192. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 31, 2014 at 8:43am.

193. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

194. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

195. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT VIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

196. Plaintiff repeats and re-alleges each and every factual allegation above.

197. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 31, 2014 at 4:18pm.

198. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

199. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

200. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT IX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

201. Plaintiff repeats and re-alleges each and every factual allegation above.
202. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 1, 2014 at 1:36pm.
203. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
204. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.
205. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT X

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

206. Plaintiff repeats and re-alleges each and every factual allegation above.
207. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 2, 2014 at 5:01pm.

208. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

209. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

210. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT XI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

211. Plaintiff repeats and re-alleges each and every factual allegation above.

212. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 3, 2014 at 3:36pm.

213. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

214. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

215. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT XII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

216. Plaintiff repeats and re-alleges each and every factual allegation above.

217. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 4, 2014 at 5:41pm.

218. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

219. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

220. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT XIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

221. Plaintiff repeats and re-alleges each and every factual allegation above.
222. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 5, 2014 at 5:17pm.
223. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
224. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.
225. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT XIV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

226. Plaintiff repeats and re-alleges each and every factual allegation above.

227. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 6, 2014 at 2:42pm.

228. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

229. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

230. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT XV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

231. Plaintiff repeats and re-alleges each and every factual allegation above.

232. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 8, 2014 at 1:11pm.

233. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

234. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

235. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff.

COUNT XVI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

236. Plaintiff repeats and re-alleges each and every factual allegation above.

237. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 8, 2014 at 9:43am.

238. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

239. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XVII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

240. Plaintiff repeats and re-alleges each and every factual allegation above.

241. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 9, 2014.

242. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

243. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XVIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

244. Plaintiff repeats and re-alleges each and every factual allegation above.

245. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 10, 2014 at 4:06pm.

246. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

247. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XIX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

248. Plaintiff repeats and re-alleges each and every factual allegation above.

249. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 12, 2014 at 5:42pm.

250. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

251. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

252. Plaintiff repeats and re-alleges each and every factual allegation above.

253. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 13, 2014 at 3:34pm.

254. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

255. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

256. Plaintiff repeats and re-alleges each and every factual allegation above.

257. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 14, 2014 at 3:31pm.

258. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

259. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

260. Plaintiff repeats and re-alleges each and every factual allegation above.

261. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 15, 2014 at 3:55pm.

262. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

263. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

264. Plaintiff repeats and re-alleges each and every factual allegation above.

265. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 15, 2014 at 9:22am.

266. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

267. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXIV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

268. Plaintiff repeats and re-alleges each and every factual allegation above.

269. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 16, 2014 at 4:42pm.

270. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

271. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

272. Plaintiff repeats and re-alleges each and every factual allegation above.
273. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 17, 2014 at 7:12pm.
274. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
275. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXVI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

276. Plaintiff repeats and re-alleges each and every factual allegation above.
277. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 18, 2014 at 4:11pm.

278. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

279. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXVII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

280. Plaintiff repeats and re-alleges each and every factual allegation above.

281. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 19, 2014 at 4:37pm.

282. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

283. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXVIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

284. Plaintiff repeats and re-alleges each and every factual allegation above.
285. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 20, 2014 at 3:08pm.
286. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
287. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXIX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

288. Plaintiff repeats and re-alleges each and every factual allegation above.
289. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 21, 2014 at 3:06pm.
290. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
291. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

292. Plaintiff repeats and re-alleges each and every factual allegation above.

293. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 22, 2014 at 4:47pm.

294. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

295. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXXI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

296. Plaintiff repeats and re-alleges each and every factual allegation above.

297. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 22, 2014 at 11:05am.

298. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

299. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXXII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

300. Plaintiff repeats and re-alleges each and every factual allegation above.

301. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 23, 2014 at 4:12pm.

302. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

303. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXXIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

304. Plaintiff repeats and re-alleges each and every factual allegation above.

305. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 23, 2014 at 11:22am.

306. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

307. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXXIV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

308. Plaintiff repeats and re-alleges each and every factual allegation above.

309. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 24, 2014 at 8:49am.

310. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

311. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXXV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

312. Plaintiff repeats and re-alleges each and every factual allegation above.

313. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 25, 2014 at 7:30pm.

314. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

315. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXXVI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

316. Plaintiff repeats and re-alleges each and every factual allegation above.

317. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 25, 2014 at 1:45pm.

318. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

319. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXXVII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

320. Plaintiff repeats and re-alleges each and every factual allegation above.

321. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 26, 2014 at 3:35pm.

322. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

323. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXXVIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

324. Plaintiff repeats and re-alleges each and every factual allegation above.

325. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 26, 2014 at 7:13pm.

326. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

327. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XXXIX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

328. Plaintiff repeats and re-alleges each and every factual allegation above.

329. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 27, 2014 at 3:47pm.

330. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

331. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XL

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

332. Plaintiff repeats and re-alleges each and every factual allegation above.

333. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 27, 2014 at 5:14pm.

334. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

335. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XLI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

336. Plaintiff repeats and re-alleges each and every factual allegation above.

337. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 20, 2014 at 5:33pm.

338. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

339. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XLII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

340. Plaintiff repeats and re-alleges each and every factual allegation above.

341. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 20, 2013 at 5:33pm.

342. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

343. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XLIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

344. Plaintiff repeats and re-alleges each and every factual allegation above.

345. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 21, 2013 at 5:18pm.

346. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

347. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XLIV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

348. Plaintiff repeats and re-alleges each and every factual allegation above.

349. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 23, 2013 at 8:15am.

350. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

351. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XLV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

352. Plaintiff repeats and re-alleges each and every factual allegation above.

353. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 27, 2013 at 9:18am.

354. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

355. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XLVI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

356. Plaintiff repeats and re-alleges each and every factual allegation above.

357. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 29, 2013 at 8:30am.

358. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

359. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XLVII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

360. Plaintiff repeats and re-alleges each and every factual allegation above.

361. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 3, 2013 at 4:19pm.
362. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
363. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XLVIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

364. Plaintiff repeats and re-alleges each and every factual allegation above.
365. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 6, 2013 at 4:37pm.
366. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
367. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XLIX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

368. Plaintiff repeats and re-alleges each and every factual allegation above.

369. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 8, 2013 at 5:17pm.

370. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

371. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT L

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

372. Plaintiff repeats and re-alleges each and every factual allegation above.

373. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 9, 2013 at 3:28pm.

374. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

375. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

376. Plaintiff repeats and re-alleges each and every factual allegation above.

377. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 12, 2013 at 6:28pm.

378. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

379. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

380. Plaintiff repeats and re-alleges each and every factual allegation above.

381. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 24, 2013 at 5:01pm.

382. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

383. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

384. Plaintiff repeats and re-alleges each and every factual allegation above.

385. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 26, 2013 at 6:04pm.

386. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

387. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LIV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

388. Plaintiff repeats and re-alleges each and every factual allegation above.

389. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on January 4, 2014 at 9:15am.

390. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

391. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

392. Plaintiff repeats and re-alleges each and every factual allegation above.

393. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on January 7, 2014 at 4:32pm.

394. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

395. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LVI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

396. Plaintiff repeats and re-alleges each and every factual allegation above.

397. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on January 16, 2014 at 4:13pm.

398. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

399. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LVII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

400. Plaintiff repeats and re-alleges each and every factual allegation above.

401. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on January 21, 2014 at 9:40am.

402. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

403. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LVIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

404. Plaintiff repeats and re-alleges each and every factual allegation above.

405. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on January 26, 2014 at 5:23pm.

406. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

407. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LIX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

408. Plaintiff repeats and re-alleges each and every factual allegation above.

409. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on March 24, 2014 at 4:55pm.

410. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

411. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

412. Plaintiff repeats and re-alleges each and every factual allegation above.

413. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 3, 2014 at 4:46pm.

414. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

415. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

416. Plaintiff repeats and re-alleges each and every factual allegation above.

417. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 4, 2014 at 1:24pm.

418. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

419. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

420. Plaintiff repeats and re-alleges each and every factual allegation above.

421. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 7, 2014 at 6:47pm.

422. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

423. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

424. Plaintiff repeats and re-alleges each and every factual allegation above.

425. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 7, 2014 at 6:47pm (a few seconds after previous call).

426. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

427. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXIV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

428. Plaintiff repeats and re-alleges each and every factual allegation above.

429. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 10, 2014 at 4:13pm.

430. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

431. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

432. Plaintiff repeats and re-alleges each and every factual allegation above.

433. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 11, 2014 at 4:41pm.

434. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

435. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXVI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

436. Plaintiff repeats and re-alleges each and every factual allegation above.

437. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 17, 2014 at 3:34pm.

438. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

439. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXVII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

440. Plaintiff repeats and re-alleges each and every factual allegation above.

441. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 18, 2014 at 1:19pm.

442. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

443. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXVIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

444. Plaintiff repeats and re-alleges each and every factual allegation above.

445. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 20, 2014 at 3:47pm.

446. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

447. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXIX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

448. Plaintiff repeats and re-alleges each and every factual allegation above.

449. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 21, 2014 at 4:09pm.

450. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

451. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

452. Plaintiff repeats and re-alleges each and every factual allegation above.

453. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 22, 2014 at 4:19pm.

454. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

455. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

456. Plaintiff repeats and re-alleges each and every factual allegation above.

457. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 23, 2014 at 4:18pm.

458. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

459. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

460. Plaintiff repeats and re-alleges each and every factual allegation above.

461. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 24, 2014 at 6:56pm.

462. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

463. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

464. Plaintiff repeats and re-alleges each and every factual allegation above.

465. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 24, 2014 at 3:29pm.

466. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

467. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXIV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

468. Plaintiff repeats and re-alleges each and every factual allegation above.

469. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 25, 2014 at 5:14pm.

470. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

471. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

472. Plaintiff repeats and re-alleges each and every factual allegation above.

473. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 28, 2014 at 5:42pm.

474. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

475. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXVI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

476. Plaintiff repeats and re-alleges each and every factual allegation above.

477. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on April 30, 2014 at 11:32am.

478. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

479. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXVII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

480. Plaintiff repeats and re-alleges each and every factual allegation above.

481. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 8, 2014 at 5:53pm.

482. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

483. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXVIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

484. Plaintiff repeats and re-alleges each and every factual allegation above.

485. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 8, 2014 at 12:00pm.

486. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

487. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXIX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

488. Plaintiff repeats and re-alleges each and every factual allegation above.

489. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 9, 2014 at 5:32pm.

490. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

491. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

492. Plaintiff repeats and re-alleges each and every factual allegation above.

493. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 11, 2014 at 4:11pm.

494. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

495. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXXI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

496. Plaintiff repeats and re-alleges each and every factual allegation above.

497. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 14, 2014 at 3:27pm.

498. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

499. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXXII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

500. Plaintiff repeats and re-alleges each and every factual allegation above.

501. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 22, 2014 at 4:44pm.

502. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

503. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXXIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

504. Plaintiff repeats and re-alleges each and every factual allegation above.

505. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 23, 2014 at 7:11pm.

506. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

507. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXXIV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

508. Plaintiff repeats and re-alleges each and every factual allegation above.

509. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 23, 2014 at 4:10pm.

510. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

511. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXXV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

512. Plaintiff repeats and re-alleges each and every factual allegation above.

513. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 24, 2014 at 4:55pm.

514. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

515. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXXVII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

516. Plaintiff repeats and re-alleges each and every factual allegation above.

517. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 25, 2014 at 4:51pm.

518. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

519. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXXVIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

520. Plaintiff repeats and re-alleges each and every factual allegation above.

521. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on May 26, 2014 at 6:54pm.

522. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

523. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT LXXXIX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

524. Plaintiff repeats and re-alleges each and every factual allegation above.

525. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 8, 2014 at 3:17pm.

526. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

527. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XC

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

528. Plaintiff repeats and re-alleges each and every factual allegation above.

529. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on June 14, 2014 at 8:23am.

530. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

531. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XCI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

532. Plaintiff repeats and re-alleges each and every factual allegation above.

533. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on August 11, 2014 at 1:19pm.

534. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

535. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XCII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

536. Plaintiff repeats and re-alleges each and every factual allegation above.

537. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on August 11, 2014 at 1:14pm.

538. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

539. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XCIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

540. Plaintiff repeats and re-alleges each and every factual allegation above.

541. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on August 12, 2014 at 5:46pm.

542. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

543. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XCIV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

544. Plaintiff repeats and re-alleges each and every factual allegation above.

545. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on August 19, 2014 at 1:26pm.

546. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

547. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XCV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

548. Plaintiff repeats and re-alleges each and every factual allegation above.

549. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on August 25, 2014 at 4:21pm.

550. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

551. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XCVI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

552. Plaintiff repeats and re-alleges each and every factual allegation above.

553. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on September 3, 2014 at 10:46am.

554. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

555. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XCVII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

556. Plaintiff repeats and re-alleges each and every factual allegation above.

557. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on September 5, 2014 at 2:45pm.

558. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

559. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XCVIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

560. Plaintiff repeats and re-alleges each and every factual allegation above.
561. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on September 15, 2014 at 11:31am.
562. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
563. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT XCIX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

564. Plaintiff repeats and re-alleges each and every factual allegation above.
565. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on September 23, 2014 at 2:06pm.

566. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

567. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT C

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

568. Plaintiff repeats and re-alleges each and every factual allegation above.

569. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on September 26, 2014 at 3:14pm.

570. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

571. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

572. Plaintiff repeats and re-alleges each and every factual allegation above.

573. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on September 29, 2014 at 7:11pm.

574. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

575. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

576. Plaintiff repeats and re-alleges each and every factual allegation above.

577. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on September 30, 2014 at 4:58pm.

578. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

579. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

580. Plaintiff repeats and re-alleges each and every factual allegation above.

581. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on October 8, 2014 at 11:31am.

582. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

583. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CIV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

584. Plaintiff repeats and re-alleges each and every factual allegation above.

585. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on October 9, 2014 at 7:06pm.

586. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

587. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

588. Plaintiff repeats and re-alleges each and every factual allegation above.

589. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on October 13, 2014 at 11:28am.

590. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

591. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

592. Plaintiff repeats and re-alleges each and every factual allegation above.
593. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on October 20, 2014 at 4:58am.
594. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
595. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CVI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

596. Plaintiff repeats and re-alleges each and every factual allegation above.
597. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on October 22, 2014 at 7:09pm.

598. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

599. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CVII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

600. Plaintiff repeats and re-alleges each and every factual allegation above.

601. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on October 23, 2014 at 2:37pm.

602. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

603. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CVIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

604. Plaintiff repeats and re-alleges each and every factual allegation above.

605. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on October 27, 2014 at 5:47pm.

606. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

607. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CIX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

608. Plaintiff repeats and re-alleges each and every factual allegation above.

609. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on October 28, 2014 at 4:32pm.

610. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

611. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

612. Plaintiff repeats and re-alleges each and every factual allegation above.

613. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on October 29, 2014 at 4:27pm.

614. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

615. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

616. Plaintiff repeats and re-alleges each and every factual allegation above.

617. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on October 29, 2014 at 3:11pm.

618. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

619. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

620. Plaintiff repeats and re-alleges each and every factual allegation above.

621. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on October 30, 2014 at 12:34pm.

622. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

623. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

624. Plaintiff repeats and re-alleges each and every factual allegation above.
625. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on October 31, 2014 at 6:51pm.
626. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).
627. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXIV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

628. Plaintiff repeats and re-alleges each and every factual allegation above.
629. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on October 31, 2014 at 1:55pm.

630. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

631. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

632. Plaintiff repeats and re-alleges each and every factual allegation above.

633. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 4, 2014 at 11:53am.

634. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

635. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXVI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

636. Plaintiff repeats and re-alleges each and every factual allegation above.

637. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 4, 2014 at 10:25am.

638. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

639. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXVII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

640. Plaintiff repeats and re-alleges each and every factual allegation above.

641. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 6, 2014 at 2:08pm.

642. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

643. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXVIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

644. Plaintiff repeats and re-alleges each and every factual allegation above.

645. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 7, 2014 at 2:22pm.

646. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

647. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXIX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

648. Plaintiff repeats and re-alleges each and every factual allegation above.

649. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 11, 2014 at 10:49am.

650. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

651. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

652. Plaintiff repeats and re-alleges each and every factual allegation above.

653. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 11, 2014 at 10:48am.

654. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

655. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

656. Plaintiff repeats and re-alleges each and every factual allegation above.

657. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 12, 2014 at 3:21pm.

658. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

659. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

660. Plaintiff repeats and re-alleges each and every factual allegation above.

661. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on November 24, 2014 at 2:32pm.

662. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

663. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

664. Plaintiff repeats and re-alleges each and every factual allegation above.

665. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 1, 2014 at 10:46am.

666. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

667. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXIV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

668. Plaintiff repeats and re-alleges each and every factual allegation above.

669. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 3, 2014 at 4:29pm.

670. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

671. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

672. Plaintiff repeats and re-alleges each and every factual allegation above.

673. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 3, 2014 at 3:49pm.

674. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

675. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXVI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

676. Plaintiff repeats and re-alleges each and every factual allegation above.

677. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 3, 2014 at 3:48pm.

678. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

679. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXVII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

680. Plaintiff repeats and re-alleges each and every factual allegation above.

681. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 5, 2014 at 10:50am.

682. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

683. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXVIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

684. Plaintiff repeats and re-alleges each and every factual allegation above.

685. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 12, 2014 at 10:44am.

686. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

687. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXIX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

688. Plaintiff repeats and re-alleges each and every factual allegation above.

689. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 15, 2014 at 11:25am.

690. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

691. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

692. Plaintiff repeats and re-alleges each and every factual allegation above.

693. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 16, 2014 at 9:58am.

694. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

695. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXXI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

696. Plaintiff repeats and re-alleges each and every factual allegation above.

697. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 19, 2014 at 2:11pm.

698. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

699. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXXII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

700. Plaintiff repeats and re-alleges each and every factual allegation above.

701. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on December 26, 2014 at 3:41pm.

702. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

703. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXXIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

704. Plaintiff repeats and re-alleges each and every factual allegation above.

705. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on January 2, 2015 at 12:35pm.

706. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

707. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B),

is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXXIV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

708. Plaintiff repeats and re-alleges each and every factual allegation above.

709. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on January 23, 2015 at 12:35pm.

710. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

711. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXXV

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

712. Plaintiff repeats and re-alleges each and every factual allegation above.

713. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on January 26, 2015 at 12:22pm.

714. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

715. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXXVI

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

716. Plaintiff repeats and re-alleges each and every factual allegation above.

717. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on January 30, 2015 at 10:50am.

718. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

719. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXXVII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

720. Plaintiff repeats and re-alleges each and every factual allegation above.

721. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on February 6, 2015 at 10:40am.

722. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

723. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXXVIII

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

724. Plaintiff repeats and re-alleges each and every factual allegation above.

725. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on February 9, 2015 at 11:59am.

726. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

727. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

COUNT CXXXIX

VIOLATION OF TELEPHONE CONSUMER PROTECTION ACT (47 U.S.C. § 227)

OCWEN LOAN SERVICING, LLC

728. Plaintiff repeats and re-alleges each and every factual allegation above.

729. Defendant made an unsolicited and unauthorized telephone call using a prerecorded or artificial voice to the telephone number of Plaintiff on February 12, 2015 at 8:10am.

730. Defendant has, therefore, violated the TCPA, 47 U.S.C. §227(b)(1)(A)(iii) and 47 U.S.C. §227(b)(1)(B).

731. As a result of Defendant's illegal conduct, the Plaintiff had his privacy rights violated, has suffered actual and statutory damages and, under 47 U.S.C. §227(b)(3)(B), is entitled, inter alia, to a minimum of \$500.00 in damages for each such violation of the TCPA.

732. To the extent the Court determines that Defendant's conduct was willful and knowing, the Court should, pursuant to §227(b)(3)(C), treble the amount of statutory damages recoverable by Plaintiff

DEMAND FOR JURY TRIAL

733. Plaintiff is entitled to and hereby demands a trial by jury.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 2/28/17

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Corey Ellington", is written over a horizontal line.

Corey Ellington (Plaintiff)

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